

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:	PROMESA Title III
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	No. 17 BK 3283-LTS
as representative of	(Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>	This filing relates to the Commonwealth, HTA and ERS.

**MOTION FOR EXTENSION OF TIME TO OPPOSE ONE HUNDRED THIRTY-SIXTH
OMNIBUS OBJECTION**

To the Honorable Laura Taylor Swain, United States District Judge:

COMES NOW Blanca I. Berdiel-López (hereinafter “Berdiel”), through the undersigned counsel, and respectfully states and prays as follows:

1. Berdiel informs that her correct mailing address is: Urb. Los Maestros, 69 Calle Francisco Pietri, Adjuntas, PR 00601. Her telephone number is 787-901-1646 and her email address is berdielb@gmail.com .
2. On June 29, 2018 Berdiel filed a proof of claim in the instant case. Her claim was identified as number 132759.
3. On January 14, 2020 the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (collectively “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (“Oversight Board”) filed a motion entitled *One Hundred Thirty-Sixth Omnibus Objection (Non Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and*

Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes (“the Omnibus Objection”).

4. The Omnibus Objection contends that Berdiel’s, and many others’, proof of claims are deficient, and therefore should be disallowed.
5. Debtor’s further claim that, prior to the filing of the Omnibus Objection, they sent a letter to Berdiel requesting additional information, and that she should respond by October 23, 2019.
6. Berdiel represents that she did not receive the aforementioned letter, hence she failed to respond by the October 23 deadline.
7. Nevertheless, Berdiel intends to provide additional information, and/or oppose the Omnibus Objection.
8. Berdiel is in the process of obtaining the necessary documentation to better assert her claim against Debtors, but has been unable to do so. As such, she is requesting until Monday February 24, 2020 to furnish additional information, and/or oppose the Omnibus Objection.

WHEREFORE, Berdiel requests that the Court grant the requested extension.

I HEREBY CERTIFY: that I electronically filed the foregoing with the Court using the CM/ECF system which will send automatic notification of such filing to the attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of February, 2020.

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